

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION)	MDL 2804
OPIATE LITIGATION)	
)	Case No. 1:17-md-2804-DAP
This document relates to:)	
)	Judge Dan Aaron Polster
<i>State of Alabama v. Purdue Pharma LP, et al.</i>)	
Case No. 1:18-OP-45236-DAP (N.D. Ohio))	

**POSITION PAPER ON THE COURT’S PROTECTIVE ORDERS
REGARDING ARCOS DATA AND SUSPICIOUS ORDER REPORTS**

Comes now the State of Alabama, and, in accordance with this Court’s order of June 24, 2019 (Doc. 1725), submits its position paper on the issue of whether the Court should lift its Protective Orders regarding the ARCOS data and the Suspicious Order Reports that have been produced in this case. The State of Alabama offers the following:

The State of Alabama has filed the following documents that contain ARCOS data:

1. The State of Alabama’s First Amended Complaint, filed under seal on May 18, 2018, (Doc. 474);
2. The State of Alabama’s Corrected First Amended Complaint, filed under seal on July 10, 2018, (Doc. 732);
3. The State of Alabama’s Corrected First Amended Complaint (redacted version for the public record), filed on July 10, 2018, (Doc. 733);
4. The State of Alabama’s Combined Response to McKesson’s and the Manufacturers’ Motions to Dismiss (redacted version for the public record), filed on August 3, 2018, (Doc. 845); and,
5. The State of Alabama’s Combined Response to McKesson’s and the Manufacturers’ Motions to Dismiss, filed under seal on August 3, 2018 (Doc. 846).

The State has not filed any documents containing information from any Suspicious Order Reports.

With regard to the issue of whether this Court should lift the Protective Orders, the State

of Alabama has no objection to the non-redacted documents listed above being unsealed and the information contained therein being made public. Otherwise, it takes no position on whether this Court should lift the Protective Orders regarding the ARCOS data or Suspicious Order Reports.

Respectfully submitted,

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/s/ Michael G. Dean
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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

/s/ Michael G. Dean
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